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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 23, 1993

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 93-252 - Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Reply Comments*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

William F. Adler

Enclosures

No. of Copies rec'd 0+5
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Sections 3(n) and 332 of the Communications Act	)	GN Docket No. 93-252
	)	
Regulatory Treatment of Mobile Services	)	
	)	

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

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Date: November 23, 1993

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SUMMARY

Some commenters support a narrow definition of commercial mobile service. Such an approach defeats the Congressional intent to achieve regulatory parity among services that are substantially similar. The components of the definition of commercial mobile service (provided for profit; interconnected service; and available to the public or to such classes of the public as to be effectively available to a substantial portion of the public) must be defined broadly to ensure that artificial distortions in the marketplace are not created by regulatory asymmetry.

Likewise, the Commission should apply its forbearance decisions equally to all commercial mobile service providers. Selective imposition of tariff regulation would hinder competition rather than promote it. Regulatory parity also supports the treatment of all PCS services as commercial services.

The principles developed in the Expanded Interconnection proceeding have no application to this proceeding. However, we support the interconnection of commercial mobile service providers to enable the ubiquitous origination and termination of telecommunications.

The issue of mutual compensation is essentially a rate issue that is beyond the scope of this proceeding. Moreover, it is largely an issue under state jurisdiction.

There is no need to impose a separate subsidiary requirement on commercial mobile services provided by local

exchange carriers. Separate subsidiaries would simply add unnecessary regulatory costs to services that are competitive.

The Commission should impose upon the AT&T/McCaw combination an unbundling requirement on interLATA and local wireless services until such time as the RBOCs are permitted to enter the interLATA business.

Equal access obligations should be imposed on all providers of all commercial mobile services until the RBOCs receive relief from the equal access obligation relating to wireless services.

A minimum of regulatory requirements imposed equally on all commercial mobile services providers will allow true competition in commercial mobile services to flourish.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Sections 3(n) and 332 of the Communications Act	)	GN Docket No. 93-252
	)	
Regulatory Treatment of Mobile Services	)	
	)	

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

The Commission received extensive comment relating to the many issues involved in the implementation of Title VI, Section 60002(b) of the Omnibus Budget Reconciliation Act of 1993 ("Budget Act"). Pacific Bell and Nevada Bell hereby respond to selected issues raised in the comments.

I. COMMERCIAL MOBILE SERVICE PROVIDERS SHOULD HAVE A RIGHT TO INTERCONNECT WITH THE LOCAL EXCHANGE CARRIERS AND OTHER COMMERCIAL MOBILE SERVICE PROVIDERS TO ENABLE THE UBIQUITOUS ORIGINATION AND TERMINATION OF TELECOMMUNICATIONS

The Notice of Proposed Rule Making ("NPRM") requested comment on whether commercial mobile service ("CMS") providers should be required to provide interconnection to other mobile service providers.[1] However, as PN Cellular noted, the NPRM offered no guidance on what is meant by the concept of requiring commercial mobile service carriers to provide interconnection to

[1] In the Matter of Implementation of Sections 3(n) and 332 of the Communications Act Regulatory Treatment of Mobile Services, GEN Docket No. 93-252, Notice of Proposed Rulemaking, released October 8, 1993, para. 71.

other mobile service providers.[2] Not surprisingly, the comments reflected different approaches to the concept and commenters were quite divided on whether any interconnection should be required. MCI, for example, stated that "CMS providers' interconnection responsibilities [should] include the provision of access to their mobile databases (HLR or VLR or their equivalent) to interexchange carriers."[3] The National Cellular Resellers Association suggested that the Commission utilize the policies and procedures adopted in the Expanded Interconnection proceeding (7 FCC Rcd 7369 (1992)) as the framework for the implementation of CMS interconnect responsibilities."[4]

Pacific Bell and Nevada Bell continue to believe that interconnectivity of mobile communications is in the public interest so we support interconnection to enable the ubiquitous origination and termination of telecommunications. For this reason, we have no objection to permitting mobile service providers to send messages to our mobile databases that solely enable the identification and location of customers. However, there is no reason to apply principles developed in the Expanded Interconnection proceeding to the interconnection of commercial mobile service providers. The market for commercial mobile services is competitive. No providers have essential facilities that require virtual or physical collocation to promote

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[2] Comments of PN Cellular, Inc. and Affiliates, p. 4.

[3] Comments of MCI, p. 10.

[4] Comments of the National Cellular Resellers Association, p. 20.

competition. Therefore, the principles developed in the Expanded Interconnection proceeding have no application to this proceeding.[5]

II. CONSIDERATION OF RATE-RELATED ISSUES SUCH AS MUTUAL COMPENSATION IS BEYOND THE SCOPE OF THIS PROCEEDING

MCI,[6] Time Warner,[7] Corporate Technology Partners[8] and General Communications, Inc.[9] all advocate that mobile service providers should be compensated for terminating traffic from the LECs. The Commission did not request comment on this issue which is essentially one of appropriate rates for interconnection.[10] Consideration of rate issues is premature and beyond the scope of this rulemaking. Moreover, this is largely an issue under state jurisdiction. As the Commission noted in Policy Statement on interconnection of Cellular Systems:

> In view of the fact that cellular carriers are generally engaged in the provision of local, intrastate, exchange services, the compensation arrangements among cellular

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[5] We do not agree with the Commission's application of mandatory collocation in the Expanded Interconnection proceeding. Along with some other LECs, we have petitioned for review of the FCC decision. Bell Atlantic Telephone Cos., et. al. v. Federal Communications Commission, U.S. Court of Appeals for the D.C. Circuit, Nos. 92-1619 and 92-1620.

[6] Comments of MCI, pp. 1-3.

[7] Comments of Time Warner Telecommunications, p. 9.

[8] Comments of Corporate Technology Partners, p. 1.

[9] Comments of General Communications, Inc., pp. 4-5.

[10] This is a complex issue involving consideration of universal service and "carrier of last resort" obligations.

carriers and local telephone companies are largely a matter of state, not federal concern.[11]

III. THE TREATMENT OF PCS AS A PRIVATE SERVICE IS CONTRARY TO THE LEGISLATION

Commenters responded with divergent views with respect to the issue of whether all PCS services should be classified as commercial services. Some commenters would prefer to have the option to have PCS classified as private.[12] This treatment is not supported by the legislative history. Congressman Markey stated in the floor debate on the House Energy and Commerce Committee Bill that "the fact that this legislation ensures PCS, the next generation of communications will be treated as a common carrier is an important win for consumers...."[13] In addition, the House Report to the Budget Act stated: "The Committee finds that the disparities in the current regulatory scheme could impede the continued growth and development of commercial mobile services and deny consumers the protections they need if new services such as PCS were classified as private."[14] Thus, the Commission was absolutely right in the NPRM when it stated that "We believe that a primary objective of

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[11] In the Matter of the Need to Promote Competition and Efficient Use for Spectrum for Radio Common Carrier Service, 59 RR, 1275, 1284 (1986).

[12] See e.g., Comments of Telephone and Data Systems, Inc., p. 17; Comments of Motorola, Inc., p. 12; Comments of TRW Inc., p. 27.

[13] 139 Cong. Rec. H3287 (daily ed. May 27, 1993).

[14] H.R. Rep. No. 111, 103rd Cong., 1st Sess., p. 260 (1993).

Congress in revising Section 332 was to ensure that such [PCS] services would be regulated as commercial mobile services."[15]

Provision of PCS under private carriage is not only contrary to Congressional intent, but as we explained in our comments, it is contrary to the Commission's goals with respect to PCS, particularly the goal of universality of service.[16] To ensure that functionally equivalent services are regulated in the same manner, all PCS services should be classified as commercial.

IV. NO ADDITIONAL SAFEGUARDS NEED TO BE IMPOSED UPON DOMINANT COMMON CARRIERS PROVIDING COMMERCIAL MOBILE SERVICES

In the NPRM the Commission requested comment on whether to impose safeguards on dominant common carriers affiliated with commercial mobile service providers.[17] These safeguards are identified as Part 32 and Part 64 rules which consist of accounting regulations aimed at ensuring that costs for nonregulated affiliates are not passed on and included as costs of the regulated carriers. We note that the Commission has already decided not to require additional cost-accounting safeguards for local exchange carriers that provide PCS.[18]

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15 NPRM, para. 45.

16 Comments of Pacific Bell and Nevada Bell, pp. 13-14.

17 NPRM, para. 45.

18 In the Matter of the Commission's Rules to Establish New Personal Communications Service, GEN Docket No. 90-314, RM-7140, RM-7175, RM-7618, Second Report and Order, released October 22, 1993, para. 126 ("PCS Second Report and Order").

We agree with Bell Atlantic that accounting rules should be applied across the board to all dominant carriers which provide any type of CMS.[19] Regulatory parity demands that accounting rules not be imposed selectively.

Cox Enterprises, Inc. stated that separate subsidiaries for all LEC CMS activities are essential to minimize opportunities for cross-subsidization and discriminatory behavior.[20] Comcast Corporation also supported a separate subsidiary requirement for whenever a CMS provider is affiliated with a LEC.[21]

In other proceedings, the Commission has concluded that separate subsidiaries are unnecessary. With respect to enhanced services, the Commission stated: "[O]ur experience with structural separation shows that it inhibits BOC provision of enhanced services.... It imposes direct monetary costs and results in loss of efficiencies and economies of scope."[22] With respect to the provision of CPE, the Commission removed the structural separation requirement because it found:

> The net benefits of the structural separation requirement now imposed on the CPE and basic services operations of the BOCs balanced against the net benefits of non-structural safeguards designed to meet

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19 Comments of Bell Atlantic, p. 36.

20 Comments of Cox Enterprises, Inc., p. 6.

21 Comments of Comcast Corporation, p. 9.

22 In the Matter of Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, CC Docket No. 90-623, Report and Order, 6 FCC Rcd 7571, para. 8 (1991), appeal pending sub. nom., California v. FCC, No. 92-70083 (9th Cir. filed Feb. 14, 1992).

> the same regulatory goals, lead us to conclude that the structural requirements should be eliminated. We see substantial benefits to users in permitting the BOCs to respond to marketplace demands by organizing their CPE and basic services operations in the most efficient way to satisfy consumers.[23]

We note that recently the Commission has concluded that separate subsidiaries are not required for the provision of PCS by LEC affiliates. The Commission stated, "[B]y seriously limiting the ability of LECs to take advantage of their potential economies of scope, such [separate subsidiary] requirements would jeopardize, if not eliminate, the public interest benefits we seek through LEC participation in PCS."[24] There is no basis for treating LEC commercial mobile services differently. Separate subsidiaries would simply add unnecessary regulatory costs to services that are competitive.

V. THE COMMISSION SHOULD APPLY ITS FORBEARANCE DECISIONS EQUALLY TO ALL COMMERCIAL MOBILE SERVICE PROVIDERS

The comments contained widespread support for the forbearance of Section 203 tariffing requirements to CMS because of the competitive market that exists. However, General Communications, Inc. stated that dominant carriers and their affiliates should not be exempt from any of the Title II

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[23] In the Matter of Furnishing Customer Premises Equipment by Bell Operating Telephone Companies and the Independent Companies, CC Docket No. 86-79, Report and Order, 2 FCC Rcd 1431, para. 31 (1987); Memorandum Opinion and Order on Reconsideration, 3 FCC Rcd 22 (1987).

[24] PCS Second Report and Order, para. 126.

requirements because of the market power that they possess.[25] The National Cellular Resellers Association stated that "CMS facilities-based carriers must at least file tariffs setting forth precise wholesale rates but need not contain support data."[26]

Pacific Bell and Nevada Bell object to these positions. In the competitive market of commercial mobile services no single carrier will possess sufficient market power to warrant any tariffing requirements for end user rates, either retail or wholesale. Commercial mobile services such as PCS and SMRs will compete not only with other PCS and SMR providers but also with each other and other commercial mobile services such as cellular and paging. There is no need to selectively impose costly tariff regulation.

However, this is just what the commenters noted above want because they know asymmetrical tariff regulation works to their benefit. It permits competitors to use the tariffing process to delay another competitor's offering and also creates a price umbrella that shelters inefficient service providers. But it does not promote competition. It produces marketplace distortions.

There is no basis for the Commission to depart from its tentative view that it is appropriate to forbear from tariff regulation of the rates for all CMS provided to end users.

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[25] Comments of General Communications, Inc., p. 3.

[26] Comments of National Cellular Resellers Association, p. 18.

Application of Sections 201 (Service charges and Interconnection), 202 (Discriminations and Preferences), 206 (Liability of Carriers for Damages), 207 (Recovery of Damages), 208 (Complaints), and 209 (Orders for Payment of Money) are sufficient to provide adequate protection to consumers.

Sections 223 (Obscene or Harassing Telephone Call in the District of Columbia or in Interstate or Foreign Communications), 225 (Telecommunications Services for Hearing-Impaired and Speech-Impaired Individuals), 226 (Telephone Operator Services), 227 (Restrictions on the Use of Telephone Equipment - auto dialing, telemarketers) and 228 (Regulation of Carrier Offering of Pay-Per-Call Services were enacted recently in response to concerns of consumers. It is not clear that these provisions need to be applied to mobile services. However, if the Commission does conclude that these sections should apply to mobile services, it should apply them to all mobile service providers.

VI. IF AT&T'S ACQUISITION OF McCAW IS APPROVED, AT&T AND McCAW MUST BE REQUIRED TO OFFER WIRELESS AND INTERLATA SERVICE ON AN UNBUNDLED BASIS

Bell Atlantic stated that the Commission should require that McCaw or other AT&T affiliates providing local service should not bundle local and long distance wireless service together in a single package to sell to customers.[27] We agree. As we noted in our Joint Comments with Nynex in the FCC's proceeding on AT&T's proposed acquisition of McCaw, that

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[27] Comments of Bell Atlantic, p. 30.

combination will possess enormous anticompetitive advantages, particularly vis-a-vis the RBOCs due to their inability to provide interLATA services to their wireless customers.[28] For this reason, we advocated that the Commission should impose conditions on the AT&T-McCaw combination including an unbundling requirement on interLATA and local wireless services until such time as the RBOCs are permitted to enter the interLATA business. We reiterate that position here and further recommend that any IEC/wireless combination be similarly restricted.

VII. THE COMPONENTS OF COMMERCIAL MOBILE SERVICE MUST BE DEFINED BROADLY AND CLEARLY TO ENSURE REGULATORY PARITY

The revised Section 332(d)(1) of the Communications Act defines commercial mobile service as any mobile service that is: 1) provided for profit, and 2) makes interconnected service available to the public or to such classes of the public as to be effectively available to a substantial portion of the public. The Commission requested comment on the how to define the various components of commercial mobile service.[29]

Some commenters suggested definitions that are completely at odds with the Congressional intent of regulatory parity. For example, Rockwell International Corporation suggested that services that are offered at a loss or a

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[28] In the Matter of AT&T and Craig O. McCaw, Applications to Transfer Control of McCaw Cellular Communications, Inc., Petition for Conditional Approval of Nynex and Pacific Bell, File No. ENF 93-44, November 1, 1993, pp. 5-8.

[29] NPRM, paras. 10-27.

break-even level should not be classified as "for-profit."[30] This approach would mean that two PCS providers in the same market offering similar services would be regulated differently because one was operating at a profit and the other was not. The correct approach is that of US West which suggested that "for-profit" be defined as having the intention to make a profit.[31] This creates a bright line between mobile service providers offering service for compensation and those that do not such as government, public safety, and entities licensed to use spectrum for internal uses. And it ensures that all those competing in the marketplace are regulated in the same manner.

Many commenters supported that concept of offering both commercial and private mobile services under the same license. For example, there is support for licenses of private service to lease excess capacity on a for-profit basis.[32] Other commenters support providing a commercial service and a private service on a co-primary basis.[33] We opposed this concept in our comments. The Commission would have to ensure that the appropriate regulatory framework was applied to the correct percentage of the carrier's mobile service which was commercial and the correct percentage which was private. Regulation of this type of hybrid carrier would be an administrative

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[30] Comments of Rockwell International Corporation, p. 2.

[31] Comments of US West, pp. 14-15.

[32] See e.g., Motorola, p. 7; Comments of Utilities Telecommunications Counsel, p. 5.

[33] See e.g., Comments of Advanced Mobile Comm Technologies, Inc., p. 5; Telephone and Data Systems, Inc., p. 3.

nightmare. Moreover, dual classification would create artificial differences in the market place because a functionally equivalent service could in one instance be offered by a commercial service provider and in another instance be offered by a private mobile service provider. Again to ensure regulatory parity, the regulations need to create a bright line. The best way to do this is to prohibit offering commercial and private mobile services under the same license.

For the same reasons, interconnected service and public availability of a service must also be defined broadly to avoid artificial differences in the market place. Narrow technical definitions of interconnection defeat this purpose. The best approach is that if a customer has received the benefit of interconnection with the PSN regardless of whether a time delay has occurred, interconnection for the purposes of the statute has occurred. Public availability of a service occurs even if a service is offered to a narrow class of users. In our comments we stated that any time a mobile service provider is offering service on a for-profit basis to a user who is not affiliated with the licensee nor a member of its affinity group, that constitutes a service available to the public and should be classified as a commercial service.[34] Otherwise, one service provider could aim its service offering to a discrete segment of the public under a private classification and another service provider offering the same service aimed a larger segment that encompassed the private provider's segment would come under a

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[34] Comments of Pacific Bell and Nevada Bell, pp. 6-7.

commercial classification. However, to the customer the services would be functionally equivalent. This is contrary to the statute's intent.

Several commenters maintained that even though a service is not interconnected with the network a service can still be the functional equivalent of a commercial service and regulated as a commercial service.[35] Pacific Bell and Nevada Bell agree with Nextel that to the extent a wide-area licensee provides a service which, from the customer's viewpoint, is competitive with a commercial service it should be classified as commercial regardless if it is not interconnected to the PSN.

These comments highlight the issue of what constitutes the PSN. A broader definition of the PSN will result in more services being classified as commercial and will ensure that functionally equivalent services are regulated in the same manner. In our comments we proposed the following definition of the PSN. The PSN is comprised of all entities that:

1) make use of the numbering resources of the North American Numbering Plan in the provision of their services, or
2) have access through a gateway to or are interconnected through a gateway with call (call set-up) or non-call (roaming and/or registration) associated signalling, or
3) have access to national database services such as the 800 database.

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[35] Comments of Nextel Communications, Inc., p. 15; Comments of Southwestern Bell, p. 16.

We are pleased that some other commenters also argued that a network of networks is evolving and that PSN needs to be defined broadly to include all networks.[36] Nextel proposed a definition similar to ours stating that it should encompass the capability to reach any subscriber or equipment addressable through the North American Numbering Plan.[37] We urge the Commission to recognize that a more expansive definition of the PSN supports the Congressional intent of regulatory parity.

VIII. EQUAL ACCESS OBLIGATIONS SHOULD BE IMPOSED ON WIRELESS SERVICES ONLY TO THE EXTENT TO ACHIEVE REGULATORY PARITY

As we noted in our comments, the Commission does not impose equal access requirements on cellular, paging or any other radio service providers because the market for these services is competitive.[38] Consequently, we see no reason to single out PCS for an equal access requirement. However, since the goal of Congress in enacting this legislation was the achievement of regulatory parity, we are concerned about the inequity in the current situation whereby mobile services other than one way paging provided by the Regional Holding Companies are subject to an equal access requirement imposed by the Modification of Final Judgment.

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[36] Comments of Sprint, p. 7; Comments of New York State Department of Public Service, p. 6.

[37] Comments of Nextel Communications, Inc., p. 11 n.18.

[38] Comments of Pacific Bell and Nevada Bell, p. 21.

We have sought to have this restriction removed[39] and we urge the Commission to support our efforts to obtain a regulatory regime in which no equal access obligations are imposed within competitive markets. However, until we receive relief from this obligation under the Modification of Final Judgment, we urge the Commission to impose equal access obligations on all providers of all commercial mobile services. Otherwise, the regulatory parity that Congress sought through this legislation will not be achieved.

IX. CONCLUSION

The competitive nature of the market for mobile services is strongly supported by the comments. To avoid creating artificial imbalances in this market the regulations must ensure that functionally equivalent services are regulated in the same manner. This can best be achieved through a broad

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[39] Motion of the Bell Companies for Removal of Mobile and Other Wireless Services from the Scope of the Interexchange Restrictions and Equal Access Requirement of Section II and the Decree (Dec. 13, 1991) (Cir. No. 82-0192); Letter of Michael Kellogg of September 24, 1993 to Richard Rosen re Revised Order for Generic Relief at 5-10.

definition of the terms that make up the definition of commercial mobile service and through a minimum of regulatory requirements imposed equally on all commercial mobile service providers.

Respectfully submitted,

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Date: November 23, 1993

CERTIFICATE OF SERVICE

I, Marcia Kwan, certify that the following is true and correct:

I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105.

On November 23, 1993, I served the attached "Reply Comments of Pacific Bell and Nevada Bell" by placing true copies thereof in envelopes addressed to the parties in the attached list which envelopes, with postage thereon fully prepaid. I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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By: Marcia Kwan
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